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VIA ELECTRONIC CASE FILING (CM/ECF) AND FACSIMILE

Hon. Alvin K. Hellerstein
U.S. District Court for the Southern District of New York
500 Pearl Street, Room 1050
New York, New York 10007
Fax: (212) 805-7942

Re: *JMB Shipping ATB 284, LLC v. Unico Commodities LLC, Inc., No. 1:21-cv-8907,*
Consent Request for Extension of Time

Dear Judge Hellerstein,

We represent Plaintiff JMB Shipping ATB 284, LLC (“JMB”) in the above-referenced action, and we submit this letter, pursuant to Local Civil Rule 7.1(d) and your Honor’s Individual Rule 1.D, to request a three-week extension of time to respond to Defendant Unico Commodities LLC, Inc.’s (“Unico”) motion to dismiss (“Motion”). Unico consents to this request.

Unico filed its Motion on December 23, 2021, and JMB’s response is due on January 6, 2022. Neither party has previously requested an adjournment or extension regarding the January 6 deadline. However, Unico previously sought—with JMB’s consent—a three-week extension of time to respond to the Complaint. *See* ECF No. 7. The Court granted that request. *See* ECF No. 8.

In light of the holidays, JMB requests an equivalent three-week extension of time to respond to Unico’s Motion, from January 6 to January 27, 2022. The Court has not yet scheduled any other dates in this action.

Respectfully submitted,

/s/ Rachel Maimin

Rachel Maimin

*Counsel for Plaintiff
JMB Shipping ATB 284, LLC*

cc: All counsel of record via CM/ECF



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